

To
Clerk's Office
United States District Court
Northern District Of California
280 South 1st Street
San Jose, CA -95113

Date: 06/18/2008

FILED

JUN 20 2008

RICHARD W. WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

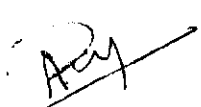
Subject: Reply from Wipro Ltd, regarding Case Number **C08 01600 PVT**

Dear Sir,

Attached is the reply I have received from Wipro Ltd., mentioned as Wipro Technologies Inc., in my complaint and summons sent to them. I took legal name of the company from their website and i sent the complaints and summons to their office in CA even though incident happened in CA and MA. I kept this name of Wipro Technologies Inc., after going through their web site <http://www.wipro.com> that Wipro Technologies Inc., is the consulting arm of the company and I am attaching the printouts from their website showing the proof of this name Wipro Technologies Inc., but if company says that legal name is Wipro Ltd., i can modify this name into my original complaint. Wipro Ltd. (Wipro Technologies Inc. mentioned in the complaint) was involved in a project with J P Morgan Chase at their Lowell, MA (U.S.A) office (With their onsite Project manager Mahesh Kolari) during my employment there from April 2006 to August 2006. I am also sending a copy of the same to the address of their lawyer (Gregory C. Cheng) mentioned is their reply attached with this letter. After getting an approval from the court and from Wipro Ltd., I will change name in my complaint from Wipro Technologies Inc., to Wipro Ltd.

Please feel free to give me a call if any other information is required.

Thanks & Regards


Anoop Rajkumar
73 Park Drive, Apt # 16
Boston, MA 02215
Tel: 650-331-7324

RSS [] | [Wipro Technologies](#)

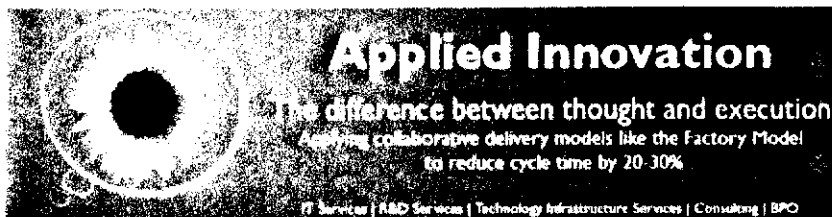


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Applied Innovation

At Wipro, we have fine-tuned the science of viewing innovation through the lens of practicality to design our solutions for end customers. Applied innovation is the ability to infuse newer ideas and newer ways of thinking things into all parts of the organization and improve business outcomes, often without major disruptive change. It is a 360-degree business approach covering process, delivery, business and technology innovations that help Wipro to work collaboratively with clients for cost take-outs, speed to market and new business opportunities. This approach is backed by a 15-year foray in providing domain-effective technology solutions and a solid delivery backbone with industry-leading credentials and certifications, such as ISO 9001:2008 and ISO 15502.

Infuse Innovation

- Learning the Fine Art of Global Collaboration
 - Reducing Time-to-Market for Mobile Apps
 - Driving Reliability in a Mature Product Organization
 - Learn at Wipro: Best Practices, A Harvard Business School case study
 - Application Assessment Model for Cloud Software Development
 - Three Strategies for Successful OSS
- To know how Wipro can work with you to convert ideas to successful results, download Applied Innovation brochure.

Wipro's collaborative innovation has been the most successful in the world.

ANALYST REPORTS

Wipro is a Leader in SAP Implementation Services - Forrester

Forrester positions Wipro as a Strong Performer in the "The Forrester Wave" Security Consulting, Q4 2007.

Wipro has the potential to become a market leader for NGOSS - Forrester

Forrester comments Wipro's first step in building a more strategic outsourcing business model with the outsourcing acquisition.



AWARDS

- Award from the Institute for Software Testing & Software Testing Best Practice Award
- Wipro Technologies M&E Awards 2007
- Wipro and Intel are IT Outsourcing Excellence Award
- Wipro is a CMMI 5 Pinnacle Award for Software Solution Leadership
- Apmc CEO Awards 2007 & 2007 Global Excellence Awards

TESTIMONIALS

Since 1995, Wipro has provided the full range of software engineering functions for our large enterprise software clients and has fully integrated into their global team. Sun and Wipro jointly developed an Engage and Multiply Model which governs and guides the ongoing evolution of the partnership between us. We are happy to work with a partner like Wipro. They understand our business needs and help us deliver high quality solutions to our customers.

Tae Kim
Director, OSS, Integration and Engineering
Sun Microsystems, Inc.



Lack of operational efficiency is the biggest bottleneck for Wealth Managers - A Wipro research study reveals

Web 2.0 impact on outsourcing

Knowledge

Innovation Sourcing: All roads lead to Collaborative Partnerships Networks - A study conducted jointly by Wipro Technologies and KnowledgeWharton

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WIPRO TECHNOLOGIES



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Wipro Technologies is the No.1 provider of integrated business, technology and process solutions on a global delivery platform.

Wipro Technologies is a global services provider delivering technology-driven business solutions that meet the strategic objectives of our clients. Wipro has 40+ 'Centers of Excellence' that create solutions around specific needs of industries. Wipro delivers unmatched business value to customers through a combination of process excellence, quality frameworks and service delivery innovation. Wipro is the World's first CMMi Level 5 certified software services company and the first outside USA to receive the IEEE Software Process Award.

Fast Facts

- > The largest independent R&D Services provider in the world
- > Over half billion revenue from R&D
- > Among the top 3 offshore BPO services provider in the world
- > A strategic partner to five of the top ten most innovative companies in the world
- > Only Indian company to be ranked among the top 10 global outsourcing providers in IACPs 2006 Global Outsourcing 100 listing

WIPRO FACT FILE

Wipro is the world's largest independent R&D Services Provider. Learn other facts that place Wipro among industry leaders.

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MANAGEMENT TEAM

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FINANCIALS

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INFRASTRUCTURE

Wipro's secure, robust, and agile infrastructure has been rated best-in-class during client audits.

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Wipro's corporate governance charter, committees and Board of Directors.

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PEOPLE

The team that keeps Wipro on the cutting edge of innovation values.

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VALUES

Spirit of Wipro. Intensity to Win. Act with Sensitivity and Unyielding Integrity.

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QUALITY

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LOCATIONS

Wipro's global network of development centers and sales offices.

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ALLIANCES

Best-in class alliances to deliver best of breed solutions to our clients.

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RECOGNITION

Wipro's roll of honour.

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INNOVATION

The Wipro way of innovation is really about a deliberate, sustained commitment to innovation. "Innovation is Wipro - Wipro is Innovation".

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USA - Western Region

Wipro Technologies

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Suite 1000
Beverly Hills, CA 90210
Tel: 310.271.1000
Fax: 310.271.1001

Wipro Technologies - Seattle

10000 Wilshire Blvd
Suite 1000
Beverly Hills, CA 90210
Tel: 310.271.1000
Fax: 310.271.1001

North America

USA - Western Region

USA - Midwest Region

USA - Europe

USA - Americas Region

USA - Eastern Region

Canada

Mexico

"Wipro is not only investing in their infrastructure in terms of buildings, technology and quality management systems but also in terms of the recruitment of high caliber graduates, education and promotion opportunities"

Karen Forte
Head of IT,
Allianz Ireland

Wipro Technologies >>

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Steuart Tower, Suite 1300
5 One Market Plaza
San Francisco, California 94105
6 Telephone: (415) 442-4810
Facsimile: (213) 442-4870

7 Attorneys for Defendant
8 WIPRO LTD.

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 ANOOP RAJKUMAR,

12 Plaintiff,

13 v.

14 CISCO SYSTEMS, INC., WIPRO
15 TECHNOLOGIES, INC., DELOITTE
16 CONSULTING LLC, NAVAL MOHTA,
17 VENU DHARMAPURI, KEENY PAUL and
VARIOUS JOHN DOES,

18 Defendants.

Case No. C08 01600 PVT

**DEFENDANT WIPRO LTD.'S
DISCLOSURE STATEMENT PURSUANT
TO FEDERAL RULE OF CIVIL
PROCEDURE 7.1**

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CASE NO. C08 01600 PVT

DEFENDANT WIPRO LTD.'S DISCLOSURE STATEMENT PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 7.1

1 **TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE NORTHERN**
2 **DISTRICT OF CALIFORNIA:**

3 The undersigned counsel of record for Defendant Wipro Ltd. (erroneously sued as "Wipro
4 Technologies, Inc.") ("Defendant"), certifies that it has no parent corporation, and that there is no
5 publicly held corporation that owns ten percent or more of Defendant's stock.

6
7 DATED: June 13, 2008

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

8
9
10 By: 

Gregory C. Cheng

11 Attorneys for Defendant WIPRO LTD.
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CERTIFICATE OF SERVICE BY UNITED STATES MAIL

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

I am employed in the County of San Francisco, State of California; I am over the age of 18 years and not a party to this action. My business address is Steuart Tower, Suite 1300, One Market Plaza, San Francisco, California 94105.

On June 13, 2008, I served the following document(s) described as: **DEFENDANT WIPRO LTD.'S DISCLOSURE STATEMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 7.1**, on the persons below as follows:

Anoop Rajkumar, Pro-Se
73 Park Drive, Apt. #16
Boston, MA 02215

I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses as indicated above and:

- ☐ deposited the sealed envelope or package with the United States Postal Service, with the postage fully prepaid.*
- ☒ placed the envelope or package for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United State Postal Service, in a sealed envelope or package with postage fully prepaid.

I am employed in the county where the mailing occurred. The envelope or package was placed in the mail at San Francisco, California.

- ☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- ☒ (Federal) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on June 13, 2008, at San Francisco, California.

Jovania Faamaligi

Type Name

Signature

* (SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX OR BAG)

1 THOMAS M. MCINERNEY, State Bar No. 162055
tmm@ogletreedeakins.com
2 GREGORY C. CHENG, State Bar No. 226865
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8 Attorneys for Defendant
WIPRO LTD.

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 ANOOP RAJKUMAR,

12 Plaintiff,

13 v.

14 CISCO SYSTEMS, INC., WIPRO
15 TECHNOLOGIES, INC., DELOITTE
CONSULTING LLC, NAVAL MOHTA,
16 VENU DHARMAPURI, KEENY PAUL and
VARIOUS JOHN DOES,

17 Defendants.
18

Case No. C08 01600 PVT

**DEFENDANT WIPRO LTD.'S NOTICE
OF RELATED CASES PURSUANT TO
LOCAL RULE 3-12**

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CASE NO. C08 01600 PVT

DEFENDANT WIPRO LTD.'S NOTICE OF RELATED CASES PURSUANT TO LOCAL RULE 3-12

1 **TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE NORTHERN**
2 **DISTRICT OF CALIFORNIA:**

3 Pursuant to Local Rule 3-12 of this Court, the undersigned, counsel of record for Defendant
4 Wipro Ltd. (erroneously sued as "Wipro Technologies, Inc.") ("Defendant"), certifies that
5 Defendant is aware of no cases that arise from the same events as the instant action, involve the
6 same issues of fact and law, or are likely to require substantial duplication of labor if heard by
7 different judges.

8
9 DATED: June 13, 2008

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

10
11 By: 

12 Gregory C. Cheng

13 Attorneys for Defendant WIPRO LTD.
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CERTIFICATE OF SERVICE BY UNITED STATES MAIL

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

I am employed in the County of San Francisco, State of California; I am over the age of 18 years and not a party to this action. My business address is Steuart Tower, Suite 1300, One Market Plaza, San Francisco, California 94105.

On June 13, 2008, I served the following document(s) described as: **DEFENDANT WIPRO LTD.'S NOTICE OF RELATED CASES PURSUANT TO LOCAL RULE 3-12**, on the persons below as follows:

Anoop Rajkumar, Pro-Se
73 Park Drive, Apt. #16
Boston, MA 02215

I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses as indicated above and:

☐ deposited the sealed envelope or package with the United States Postal Service, with the postage fully prepaid.*

☒ placed the envelope or package for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United State Postal Service, in a sealed envelope or package with postage fully prepaid.

I am employed in the county where the mailing occurred. The envelope or package was placed in the mail at San Francisco, California.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on June 13, 2008, at San Francisco, California.

Jovania Faamaligi
Type Name

Signature

* (SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX OR BAG)